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November 23, 2020

Chambers of the Hon. Elizabeth S. Stong
United States Bankruptcy Court- Eastern District of New York
271-C Cadman Plaza East, Courtroom 3585
Brooklyn, NY 11201

Re: *In re Milagro Aguilar*
Ch. 13 Case No.: 17-46833-ESS
STATUS REPORT

Honorable Madame,

I represent the Debtor in the above referenced matter. The Trustee's Motion to Dismiss is scheduled for December 7, 2020 at 9:00 a.m.. As stated at the last conference, I was intending on filing a §1329 Motion to amend the Debtor's chapter 13 plan post confirmation to resolve the plan arrears, but a discrepancy has also arisen regarding post-petition arrears with the new mortgage servicer. I am working to clarify the amount of arrears with the lender and my client. The §1329 Motion will have to include post-petition arrears to the mortgage company. Therefore, I am respectfully requesting the Court's indulgence and an extension of time to file the §1329 Motion and that the Trustee's Motion to Dismiss be adjourned.

Respectfully,

/s/ Vincent Cuocci
Vincent Cuocci, Esq.

VC/lt
cc: Marianne DeRosa, Chapter 13 Trustee